

Remarks/Arguments:

Favorable reconsideration of this application, in light of the present amendments and following discussion, is respectfully requested.

Claims 12-33 are pending; Claims 1-11 were previously canceled; Claims 12, 14, 15, and 17-22 are amended herewith; and Claims 23-33 are newly added. It is respectfully submitted that no new matter is added by this amendment.

In the outstanding Office Action, Claims 15 and 16 were rejected under 35 U.S.C. § 112, second paragraph; Claims 12, 13, and 18-21 were rejected under 35 U.S.C. § 103(a) as unpatentable over Oshino et al. (U.S. Pat. No. 5,414,450, hereafter Oshino) in view of Eisaku (JP Pub. 63179770); Claims 14-16 and 22 were rejected under 35 U.S.C. § 103(a) as unpatentable over Oshino in view of Eisaku and further in view of Fujitsu (EP Pub. 0556071A2); and Claim 17 was rejected under 35 U.S.C. § 103(a) as unpatentable over Oshino in view of Eisaku and further in view of Brooks et al. (U.S. Pat. No. 4,595,935, hereafter Brooks).

With regard to the rejection of Claims 15 and 16 under 35 U.S.C. § 112, second paragraph, Claims 14 and 15 have been amended herewith, thereby obviating this rejection. It is therefore respectfully requested that this rejection be withdrawn.

With regard to the rejection of Claims 12, 13, and 18-21 under 35 U.S.C. § 103(a) as unpatentable over Oshino in view of Eisaku, that rejection is respectfully traversed.

In the past, printing tickets of different widths was difficult. To overcome the difficulties in past printing techniques, the Applicant developed the claimed invention, which includes a means for driving having a block applied against a second face of the ticket, opposite to the first principal face, and including a first powered rotating roller capable of causing the ticket to move, and a second idling roller, extending beyond the powered roller,

which is used to drive tickets of different widths in the direction of travel. Thus, it is no longer necessary to motorize the entirety of the block. Simply put, only the powered roller need be motorized.¹ As recited in Claim 12, the means for guiding and the means for driving cooperate to drive tickets of different widths in the direction of travel. As described in the specification at page 10, the angle α formed by the block 26 with the direction of travel D helps to lay the tickets against the tabs TG1 and TG2, while the idling roller 262 advantageously serves to hold the ticket without presenting any resistance. Thus, it is possible to print tickets of different formats, in particular of different widths.²

Oshino relates to a head pressing mechanism of a thermal printer. However, as admitted in the Office Action at page 3, Oshino does not teach a first powered rotating roller capable of causing the ticket to move and a second idling roller extending beyond the powered roller which is used to drive tickets of different widths in the direction of travel. Certainly, Oshino fails to disclose or suggest means for guiding and means for driving that cooperate to drive tickets of different widths in the direction of travel.

The Office Action attempts to remedy the admitted deficiencies of Oshino by relying upon Eisaku. However, Eisaku, like Oshino, fails to disclose or suggest cooperation between means for guiding and means for driving, as recited in Claim 12.

In more detail, Eisaku describes a segmented block including a powered roller, on either side of which idling rollers are placed. This arrangement of the block suggests that no means for guiding is provided, or that no particular cooperation is provided between the block and any possible means for guiding. According to Eisaku, an angle between the block and the direction of travel, as recited in Claim 12, cannot be provided. More specifically,

¹ Specification, page 2, lines 5-15.

² Specification, page 10, lines 1-9.

according to Eisaku, the idling roller would be placed between the powered part of the block and the tab, so a small size ticket would be driven by just a little part of the powered segment of the block, while a substantial part of the block applied against the face to print would be idling. From this description, it is evident that Eisaku only teaches a segmented block including a powered part and an idling part for driving a ticket to print. Eisaku does not teach a means for guiding suitable for cooperating with the segmented block.

Accordingly, as neither Oshino nor Eisaku, either alone or in combination, discloses or suggests the limitations recited in Claim 12, it is respectfully submitted that Claim 12 patentably distinguishes over both Oshino and Eisaku. Likewise, it is respectfully submitted that Claims 13 and 18-21 patentably distinguish over Oshino and Eisaku for reasons analogous to those set forth for Claim 12, from which Claims 13 and 18-21 depend. It is therefore respectfully requested that this rejection be withdrawn.

Moreover, it is respectfully submitted that there is no basis in the teachings of either Oshino or Eisaku to support the applied combination. Certainly, the Office Actions fails to cite to any specific teachings within either of these references to support the applied combination. It is therefore respectfully submitted that the combination of Oshino and Eisaku is based upon hindsight reconstruction, and is improper.

Regarding the rejection of Claims 14-16 and 22 under 35 U.S.C. § 103(a) as unpatentable over Oshino in view of Eisaku and further in view of Fujitsu, that rejection is also traversed. Claims 14-16 and 22 all depend from Claim 12.

As noted above, neither Oshino nor Eisaku, either alone or in combination, discloses or suggests the cooperation between the means for guiding and the means for driving, as recited in Claim 12.

As Fujitsu is not relied upon to teach the features identified as deficient in Oshino and Eisaku, it is respectfully submitted Claims 14-16 and 22 patentably distinguish over the applied combination of Oshino, Eisaku, and Fujitsu. It is therefore respectfully requested that this rejection be withdrawn.

Additionally, it is respectfully submitted that there is no basis in the teachings of any of Oshino, Eisaku, or Fujitsu to support the applied combination. Again, the Office Action fails to cite to any teachings within any of the references to support the applied combination of these three references. It is therefore respectfully submitted that the combination of Oshino, Eisaku, and Fujitsu is based upon hindsight reconstruction, and is not proper.

Regarding the rejection of Claim 17 under 35 U.S.C. § 103(a) as unpatentable over Oshino in view of Eisaku and further in view of Brooks, that rejection is also traversed. Claim 17 depends from Claim 12.

As earlier explained, neither Oshino nor Eisaku, either alone or in combination, discloses or suggests the cooperation between the means for guiding and the means for driving, as recited in Claim 12. As Brooks is not relied upon to provide the features earlier identified as deficient in the combination of Oshino and Eisaku, it is respectfully submitted that Claim 17 patentably distinguishes over the combination of Oshino, Eisaku, and Brooks, and it is respectfully requested that this rejection be withdrawn.

Moreover, it is respectfully submitted that there is no basis in the teachings in any of Oshino, Eisaku, or Brooks to support this combination, and the Office Action again fails to cite to any teachings within any of Oshino, Eisaku, and Brooks to support the applied combination. Accordingly, it is respectfully submitted that the combination of Oshino, Eisaku, and Brooks is based upon hindsight reconstruction, and is improper.

Newly added Claims 23-33 recite subject matter analogous to that set forth in Claims 12-22, and are believed to patentably distinguish over the cited references for the reasons set forth with regard to Claims 12-22.

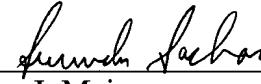
Consequently, in view of the foregoing discussion and present amendments, it is respectfully submitted that this application is in condition for allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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